

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

<b>IN RE: SKI TRAIN FIRE IN KAPRUN AUSTRIA ON NOVEMBER 11, 2000</b>	<b>X</b> : : <b>X</b>	<b>MDL # 1428 (SAS)</b>
<b>This document relates to the following cases:</b>		
<b>BLAIMAUER , et al,</b>	<b>Plaintiffs,</b>	<b>Civil Action #</b>
<b>- and -</b>	<b>:</b>	<b>03-CV-8960 (SAS)</b>
<b>OMNIGLOW CORPORATION, et al</b>	<b>Defendants.</b>	<b>:</b>
<b>X</b>		
<b>GEIER , et al,</b>	<b>Plaintiffs,</b>	<b>Civil Action #</b>
<b>- and -</b>	<b>:</b>	<b>03-CV-8961 (SAS)</b>
<b>OMNIGLOW CORPORATION, et al</b>	<b>Defendants.</b>	<b>:</b>
<b>X</b>		
<b>MITSUMOTO, et al,</b>	<b>Plaintiffs,</b>	<b>Civil Action #</b>
<b>- and -</b>	<b>:</b>	<b>06-CV-2811 (SAS)</b>
<b>REPUBLIC OF AUSTRIA, et al</b>	<b>Defendants.</b>	<b>:</b>
<b>X</b>		
<b>MITSUMOTO, et al,</b>	<b>Plaintiffs,</b>	<b>Civil Action #</b>
<b>- and -</b>	<b>:</b>	<b>07-CV-935 (SAS)</b>
<b>ROBERT BOSCH CORP., et al</b>	<b>Defendants.</b>	<b>:</b>
<b>X</b>		
<b>STADMAN, et al,</b>	<b>Plaintiffs,</b>	<b>Civil Action #</b>
<b>- and -</b>	<b>:</b>	<b>07-CV-3881 (SAS)</b>
<b>AUSTRIAN NATIONAL TOURIST OFFICE, et al,</b>	<b>Defendants.</b>	<b>:</b>
<b>X</b>		
<b>FERK, et al,</b>	<b>Plaintiffs,</b>	<b>Civil Action #</b>
<b>- and -</b>	<b>:</b>	<b>07-CV-4104 (SAS)</b>
<b>OMNIGLOW CORPORATION, et al,</b>	<b>Defendants.</b>	<b>:</b>
<b>X</b>		

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**NOTICE OF MOTION**

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**PLEASE TAKE NOTICE** that the above referenced Plaintiffs will move this Honorable Court, on a date as set by the Court, as soon as counsel can be heard, at the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, NY 10007, Courtroom 15 C, before the Honorable Shira A. Scheindlin for a Stay of all proceedings, for Recusal and for other relief.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion, Plaintiffs will rely upon (i) the Declarations of Dr. Bernd Geier, Nanae & Masatoshi Mitsumoto, Dr. Toichiro Kigawa and Edward D. Fagan together with the Exhibits thereto and (ii) Memorandum of Authorities.

Dated: August 20, 2007  
New York, NY

/s/ Edward D. Fagan (electronically signed)  
Edward D. Fagan, Esq.  
5 Penn Plaza, 23<sup>rd</sup> Floor  
New York, NY 10001  
Tel. (646) 378-2225  
Fax (646) 417-5558  
Plaintiffs' Counsel

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused the within Motion to be electronically filed with the Clerk of the Court and a hard copy is also being served upon all counsel of record.

A courtesy copy of the papers is being forwarded to the Honorable Shira A. Scheindlin.

Additional courtesy copies are being electronically, faxed and/or served and to counsel of record.

Dated: August 20, 2007  
New York, NY

/s/ Edward D. Fagan (electronically signed)  
Edward D. Fagan, Esq.